

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

LAPORSHA BROWN, individually and on behalf of all others similarly situated, <i>Plaintiff,</i> v. NAFPAKTOS, INC. dba DIAMOND CLUB CABARET, <i>et al</i> , <i>Defendants.</i>	Case No.: 4:21-cv-668
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EXHIBIT 1 DECLARATION OF LEIGH S. MONTGOMERY

I, Leigh S. Montgomery, the undersigned, being competent to testify, swear under penalty of perjury as provided by 28 U.S.C. § 1746 that the following facts and statements are true and correct, except as to such matters stated to be made on information and belief, and as to such matters, I certify that I believe the same to be true:

1. This declaration is made in support of the Plaintiff's Request for the Court Clerk to Enter a Default in the above-captioned action.
2. I attached true and correct copies of the documents referenced as Exhibits in Plaintiff's Request and incorporate them herein for all purposes.
3. I drafted and reviewed the foregoing Plaintiff's Request for Entry of Default and have personal knowledge that all statements contained therein are true and correct.
4. Plaintiff filed this lawsuit on March 1, 2021.
5. Per the executed Certificate of Service from The State of Texas, the Secretary of State received the summons in this case on August 27, 2021 and served Nafpaktos, Inc. dba Diamond Club Cabaret on September 2, 2021 at 3136 Richmond, Houston, Texas 77098, the address listed as the place of service with the Secretary of State for service.
6. No responsive pleading has been filed by Defendant Nafpaktos, Inc. dba Diamond Club Cabaret or any counsel on their behalf. No attempts to communicate or negotiate regarding the issues brought forth in this action have been instituted

by Defendant or any counsel on their behalf, despite the passage of several months since the date of service.


LEIGH S. MONTGOMERY
Counsel for Plaintiff LaPorsha Brown